



Advocates for Workplace Fairness

April 24, 2025

Via CM/ECF

The Honorable Laura T. Swain
 United States District Court for the
 Southern District of New York
 500 Pearl Street
 New York, NY 10007

MEMO ENDORSED

The final pretrial conference in this matter is hereby adjourned until **October 3, 2025, at 12:00 p.m.** The other deadlines proposed herein are hereby adopted. DE 550 resolved. SO ORDERED.

4/25/2025

/s/ Laura Taylor Swain, Chief USDJ

Re: *Wood et al. v. Mike Bloomberg 2020, Inc.*, No. 20 Civ. 2489 (LTS) (GWG)

Dear Judge Swain:

Along with co-counsel, we represent Plaintiffs, opt-in Plaintiffs, and the certified Classes in the above-referenced matter. We write to respectfully request a 90-day adjournment of the June 27, 2025 final pretrial conference, in order to avoid conflicts with counsel's calendared oral arguments in other matters, pre-planned travel, and firm holidays, and to allow the parties additional time to prepare pretrial filings. This is Plaintiffs' first request for an adjournment of the final pretrial conference. The parties have conferred, and Bloomberg does not object to Plaintiffs' adjournment request. Below are the current and proposed scheduling dates:

Event	Current Deadline	Proposed Deadline
Preliminary Conference Between Counsel	May 13, 2025	August 11, 2025
Pretrial Motions	May 28, 2025	August 26, 2025
Email Chambers to Inquire Whether Chambers Will Require Submission of Paper Copies of Trial Documents	June 13, 2025	September 11, 2025
Joint Pretrial Statement	June 20, 2025	September 18, 2025
Proposed Voir Dire, Requests to Charge, and Verdict Form	June 20, 2025	September 18, 2025
Final Pretrial Conference	June 27, 2025	September 25, 2025

Respectfully submitted,

Michael C. Danna

CC: All Record of Counsel (via ECF)